

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

ROBERTA AGYEMAN, et al.

Civil Docket Number: 18-cv-05320

PLAINTIFFS,

FOURTH NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Roberta Agyeman et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 7 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
173	Davidson, Adam	OR	Canadian	Davidson, Lawrence	Son	¶ 91
174	Davidson, Marc	Canada	Canadian	Davidson, Lawrence	Son	¶ 91

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05320
175	Dale, Tanya	NY	Canadian	Davidson, Titus	Daughter	¶ 92
176	Davidson, Janet	Canada	Canadian	Davidson, Titus	Sister	¶ 92
177	Davidson, Sam	Canada	Canadian	Davidson, Titus	Brother	¶ 92
178	Akinshara, Monica	Canada	Canadian	Davidson, Titus	Sister	¶ 92
179	White, Shirley	Canada	Canadian	Davidson, Titus	Sister	¶ 92
180	Davidson, Michelle	Canada	Canadian	Davidson, Titus	Sister	¶ 92
181	Davidson, Rose	Canada	Canadian	Davidson, Titus	Sister	¶ 92
182	Davidson, Merna	Canada	Canadian	Davidson, Titus	Sister	¶ 92
183	Davidson, Phillip	WI	Jamaican	Davidson, Titus	Brother	¶ 92
184	Davidson, Trevor	Canada	Canadian	Davidson, Titus	Brother	¶ 92
185	Choate, Dale	MA	United States	DeConto, Gerald F.	Sister	¶ 97
186	DeConto, Raymond	CT	United States	DeConto, Gerald F.	Brother	¶ 97
187	DeConto, Patricia	MA	United States	DeConto, Gerald F.	Mother	¶ 97
188	DeConto-LeBlanc, Marie	MA	United States	DeConto, Gerald F.	Sister	¶ 97
189	Caballero, Andrea	TX	United States	Caballero, Daniel M.	Sister	¶ 36

Dated: June 26, 2018

Respectfully submitted,

Jerry S. Goldman
Anderson Kill P.C.
1251 Avenue of the Americas
New York, New York
Telephone: 212-278-1000
jgoldman@andersonkill.com
COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman